

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

*In re Omnicom Group Inc. ERISA Litig.*

Case No. 1:20-cv-04141-CM-SLC

**JOINT NOTICE**

Plaintiffs Carol Maisonette, Shane Tepper, Surfina Adams, Michael Mensack, and Daniel Dise (collectively, “Plaintiffs”) and Defendants Omnicom Group, Inc., the Board of Directors of Omnicom Group, Inc., and the Administrative Committee of the Omnicom Group Retirement Savings Plan (collectively, “Defendants” and with Plaintiffs the “Parties”) hereby respectfully file this Joint Notice in response to the Court’s June 12, 2023 letter endorsement (ECF No. 250) requesting an update on the status of the Parties’ settlement.

In the time since the Parties informed the Court of their agreement in principle to resolve this action, they have been working to finalize a formal settlement agreement and supporting exhibits, including notices, claim documents, a plan of allocation, and proposed orders. Some of the matters subject to the Parties’ negotiation of settlement documents have required information and input from third parties, which the Parties have solicited and received. The Parties are presently working to resolve several discrete issues and anticipate that they will reach resolution of all such issues shortly, such that Plaintiffs will be in a position to move for preliminary approval of the settlement by June 23, 2023.

Accordingly, the Parties propose that Plaintiffs file their motion for preliminary approval by June 23, 2023.

Dated: June 13, 2023

/s/ Laurie Rubinow

James E. Miller  
Laurie Rubinow  
MILLER SHAH LLP  
65 Main Street  
Chester, CT 06412  
Telephone: (866) 540-5505  
Facsimile: (866) 300-7367  
Email: jemiller@millershah.com  
lrubinow@millershah.com

James C. Shah  
Alec J. Berin  
MILLER SHAH LLP  
1845 Walnut Street, Suite 806  
Philadelphia, PA 19103  
Telephone: (866) 540-5505  
Facsimile: (866) 300-7367  
Email: jcshah@millershah.com  
ajberin@millershah.com

Anna K. D'Agostino  
MILLER SHAH LLP  
225 Broadway Street, Suite 1830  
New York, New York 10007  
Telephone: (866) 540-5505  
Facsimile: (866) 300-7367  
Email: akdagostino@millershah.com

Kolin C. Tang  
MILLER SHAH LLP  
1401 Dove Street, Suite 510  
Newport Beach, CA 92660  
Telephone: (866) 540-5505  
Facsimile: (866) 300-7367  
Email: kctang@millershah.com

*Counsel for Plaintiffs, the Plan,  
and the Class*

Dated: June 13, 2023

/s/ Peter A. Wald

Peter A. Wald (*pro hac vice*)  
LATHAM & WATKINS LLP  
505 Montgomery Street  
Suite 2000  
San Francisco, CA 94111  
Tel: (415) 391-0600  
Fax: (415) 395-8095  
Email: peter.wald@lw.com

Jeff G. Hammel  
Adam B. Shamah  
Meredith A. Cusick  
Neethu S. Putta (*pro hac vice*)  
LATHAM & WATKINS LLP  
1271 Avenue of the Americas  
New York, NY 10020  
Tel: (212) 906-1200  
Fax: (212) 751-4864  
Email: jeff.hammel@lw.com  
adam.shamah@lw.com  
meredith.cusick@lw.com  
neethu.putta@lw.com

Heather A. Waller (*pro hac vice*)  
LATHAM & WATKINS LLP  
330 North Wabash Avenue  
Suite 2800  
Chicago, IL 60611  
Tel: (312) 876-7700  
Fax: (312) 993-9767  
Email: heather.waller@lw.com

Brent T. Murphy (*pro hac vice*)  
LATHAM & WATKINS LLP  
555 Eleventh Street, NW  
Suite 1000  
Washington, DC 20004  
Tel: (202) 637-2200  
Fax: (202) 637-2201  
Email: brent.murphy@lw.com

*Attorneys for Defendants Omnicom Group  
Inc., the Board of Directors of Omnicom*

*Group Inc., and the Administrative Committee  
of the Omnicom Group Retirement Savings  
Plan*